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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
TO USPS WITNESS WADE
(MPA/USPS-T20-7-9)**

(September 16, 1997)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS witness Wade (MPA/USPS-T20-7-9).

Respectfully submitted,



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Counsel

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**INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS WADE**

MPA/USPS-T20-7. Please refer to Attachment to Response, MPA/USPS-T20-1(n) where the MVS questionnaire guidance states "COL. c - Estimate the average (most frequent occurrence) truck load for all trip types: Choose between 0%, 25%, 50%, 75%, and 100% of capacity" and your response to MPA/USPS-T20-1(d).

- a. Please confirm that the survey provides no further guidance regarding how to calculate average load factor ("Column C") by trip type and truck type
- b. Please confirm that the United States Postal Service has not performed a study or an audit to ensure that all facilities used the same method to estimate average load factor by truck type and trip type

MPA/USPS-T20-8. Please refer to USPS-T-20, Workpaper C, Page 5, Annual Totals Section.


- a. Please confirm that the amount in the Hours column of the Annual Totals Section should be equal to the amount in the Week Day Hours column plus the amount in the Saturday Hours column.
- b. Please confirm that, for the Form 4533 example shown on Page 5 of Workpaper C, the amount in the Hours column is not equal to the amount in the Week Day Hours column plus the amount in the Saturday Hours column.
- c. Please describe the United States Postal Service's general process for checking the quality of data entered into Form 4533
- d. For the Vehicle Service Driver Study, did you perform any additional quality checks on Form 4533 data to ensure there were no errors? If so, what were your rules for determining errors in Form 4533 data and how did you perform such checks?

MPA/USPS-T20-9. Please refer to USPS-T-20, Workpaper C, Page 5 and USPS-T-20, Workpaper A, Page 1.

- a. Can a single route include multiple trip types?
- b. Can a single route include multiple truck types?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



James R. Cregan

Washington, D.C.
September 16, 1997